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August 22, 2023

Honorable Sanket J. Bulsara, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Biofer S.p.A. v. Vifor (International) AG.*, No. 1:22-cv-02180-AMD-SJB (E.D.N.Y.)

Dear Judge Bulsara:

The parties have mutually agreed to and hereby request a 3-month extension of fact discovery. Accordingly, the parties propose the following modifications to the current schedule (set forth in ECF No. 27):

Deadline	Current Deadline	Amended Deadline
Final Infringement Contentions	September 15, 2023	December 15, 2023
Final Invalidity Contentions	September 15, 2023	December 15, 2023
Completion of Fact Discovery	September 29, 2023	December 29, 2023
Opening Expert Reports	November 17, 2023	February 19, 2024
Responsive Expert Reports	December 20, 2023	March 20, 2024
Reply Expert Reports	January 17, 2024	April 17, 2024
Completion of Expert Discovery	March 8, 2024	June 10, 2024
Final date to take first step in dispositive motion practice	April 4, 2024	July 8, 2024

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If the Court agrees, we respectfully request that Your Honor So Order this modification to the schedule on the docket.

We thank the Court for its time and attention to this matter.

Sincerely yours,

/s/ Jonathan D. Ball

Jonathan D. Ball, Ph.D., Esq.